

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
RIC (LAVERNIA) LLC,	§	Case No. 24-51195-mmp
	§	
Debtor	§	Chapter 11

**NOTICE OF WITHDRAWAL OF COUNSEL**

**TO THE HONORABLE MICHAEL M. PARKER,  
UNITED STATES BANKRUPTCY JUDGE:**

Pursuant to US Bankruptcy Court Western District of Texas Local Court Rule 9010-1(b), Paul Kirklin and Kirklin Law Firm PLLC (collectively “Kirklin”) hereby withdraws as counsel of record for OTISCO RDX, LLC (“OTISCO”) in the above-captioned proceeding.

Kirklin’s appearance was limited in scope and Justin Rayome is the lead lawyer for OTISCO. Kirklin gives notice of withdrawal at this time due to irreconcilable differences with OTISCO. Under these circumstances, continued representation is no longer possible or appropriate.

(1) Justin Rayome is the lead attorney for OTISCO and shall remain lead lawyer for OTISCO after this withdrawal. His name, address, and telephone number is as follows:

Justin Rayome  
1001 West Loop South  
Houston, Texas 77027  
(214) 934- 9345

(2) Kirklin has reviewed the docket sheet and there do not appear to be any scheduled hearings or deadlines listed at this time. The 341 meeting and deadline for filing

claims have long since passed. Rayome is the lead attorney in this case, and he is fully aware of the schedule and deadlines and he remains actively representing OTISCO in this case.

(3) After due diligence, Kirklin was unable to get OTISCO's signature because OTISCO declines to sign.

Pursuant to L. Rule 9010-1(d), a copy of this Notice of Withdrawal is being served upon all of the following to the extent that they exist in this case: (a) counsel for the debtor, (b) counsel for any creditor's committee, (c) counsel for any ad hoc committee, (d) any chapter 7, 11, or 13 trustee and his or her counsel, (e) any subchapter V trustee and his or her counsel, (f) the U.S. trustee, and (g) any party that has appeared and is requesting notice, and (h) Mr. Rayome.

For the foregoing reasons, Kirklin gives notice that Kirklin is hereby withdrawing from representing OTISCO in this lawsuit (or in any other lawsuit).

Respectfully submitted,  
KIRKLIN LAW FIRM PLLC

/s/ Paul Kirklin  
Paul Kirklin  
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(832) 969-1821 / (281) 605-5252 – Fax  
*Attorney Formerly Co-Counsel for OTISCO*

### CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2025, I caused a true and correct copy of the foregoing to be served on the Defendants and their attorneys via electronic service and/or first-class mail to:

- Karalyssa C Casillas on behalf of Creditor Wilson  
County [karalyssa.casillas@lgbs.com](mailto:karalyssa.casillas@lgbs.com)  
112 E Pecan St, Suite 2200  
San Antonio, TX 78205
- Erin Coughlin on behalf of Interested Party United States  
Trustee – SA12 [erin.coughlin@usdoj.gov](mailto:erin.coughlin@usdoj.gov),  
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615 E Houston St, Suite 533  
San Antonio, TX 78205
- Howard Marc Spector on behalf of Creditor Propel Financial  
services as agent and attorney in fact for FNA VII, LLC  
[hspector@spectorcox.com](mailto:hspector@spectorcox.com), [shank@spectorcox.com](mailto:shank@spectorcox.com),  
[ahawkins@spectorco x.com](mailto:ahawkins@spectorco x.com), [slthorn@spectorcox.com](mailto:slthorn@spectorcox.com),  
[hspector@ecf.courtdrive.com](mailto:hspector@ecf.courtdrive.com)  
12770 Coit Road, Suite 850  
Dallas, Texas 75251
- George H. Spencer, Jr. on behalf of Defendant John  
Daves [gspencer@langleybanack.com](mailto:gspencer@langleybanack.com)  
745 E Mulberry Ave, Suite 700  
San Antonio, Texas 78212
- United States Trustee – SA12 [USTPRegion07.Sn.ECF@usdoj.gov](mailto:USTPRegion07.Sn.ECF@usdoj.gov)  
615 E Houston St, Suite 533  
San Antonio, TX 78205
- Natalie F. Wilson on behalf of Defendant John Daves  
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745 E Mulberry Ave, Suite 700  
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▪ Kyle Hirsch on behalf of the Debtor RIC  
(Lavernia) LLC [kyle.hirsch@bclplaw.com](mailto:kyle.hirsch@bclplaw.com),  
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1001 West Loop South  
Houston, Texas 77027

*/s/ Paul Kirklin*

Paul Kirklin